

COMPREHENSIVE SYSTEM OF PERSONNEL DEVELOPMENT COMMON QUESTIONS AND ANSWERS

**Prepared by
The Rehabilitation Training Work Group**

**The Work Group includes
Rehabilitation Services Administration
Council of State Administrators of Vocational Rehabilitation
National Council of Rehabilitation Education
Commission on Rehabilitation Counselor Certification
Council on Rehabilitation Education**

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Dear Colleague:

Thoughtful observers, contemporary writers and leaders in the field of vocational rehabilitation have consistently reported that quality services are provided by qualified personnel. In the Rehabilitation Act (The Act), the great social planners assured not only the essential services for overcoming adversity, but also the professional assistance pivotal in creating careers and building lives.

The information contained in this document will facilitate the full implementation of the historic Comprehensive System of Personnel Development (CSPD) provisions of The Act. It is reasonable to expect that consumers of vocational rehabilitation services will benefit greatly from their partnership with a qualified counselor and other rehabilitation professionals.

From various sources over an extended period of time the Rehabilitation Services Administration (RSA) collected questions and provided answers to State agencies, universities and providers on the administration of the CSPD authority. As the body of information grew it became prudent to establish a nationally recognized panel to review and contribute to the further development of policy and guidance in this important area of program administration.

The Rehabilitation Training Group (RTG) was established by the RSA Commissioner in the winter of 1999 and consists of representatives from the principal organizations responsible for and contributing to CSPD implementation. The members represent the Council of State Administrators of Vocational Rehabilitation (CSAVR), the National Council on Rehabilitation "Education (NCRE), the Commission on Rehabilitation Counselor Certification (CRCC), the Council on Rehabilitation Education (CORE) and RSA.

We are pleased to send you the first product of the RTG, entitled, "Comprehensive System of Personnel Development, Common Questions and Answers." This is the most complete treatment of issues, concerns and ideas on the subject available to consumers, administrators, educators, practitioners and researchers

As you assimilate and apply the guidance and advice presented herein, please share your thoughts and experiences with us. Your input is crucial to continuous improvement to this vital area of program administration. The belief that "Good staff do good things" is worthy of pursuit by all individuals who create quality vocational outcomes.

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COMMON CSPD QUESTIONS

A. WHO IS COVERED?

What categories of staff must have “CSPD standards?”

State agencies must develop standards, consistent with the CSPD provisions, for all professional and paraprofessional staff employed by the State agency. RSA has established a “minimum” list of professions that are considered professional and paraprofessional: Rehabilitation Counselors (including supervisors and managers who perform any counselor function – see question X), Vocational Evaluators, Job Coaches, Counselor Aides/Assistants Technicians, and Job Development/Placement Specialists. We expect State agencies to supplement this listing as appropriate to their situation.

Who does RSA consider to be a “counselor?”

RSA’s position on who is considered to be a rehabilitation counselor is anyone who does one or more of the following:

- Makes an eligibility determination
- Approves an IPE and any amendments to the IPE
- Makes the determination as to who is an individual with a significant disability
- Makes the determination as to who is an individual with a most significant disability
- Makes the determination, in consultation with the individual, of ineligibility
- Makes the determination, in consultation with the individual, that the record of service of an individual who has achieved an employment outcome can be closed

The Act states that only a “qualified counselor” can perform certain functions (e.g., eligibility determination). Does this mean that if a counselor does not meet CSPD standards they cannot perform these functions (e.g., cannot perform an eligibility determination)?

Yes. Only a qualified counselor that meets the personnel standards (consistent with CSPD requirements) can perform those functions. However, RSA guidance allows a counselor who does not currently meet the standard to perform all counselor functions IF he or she is covered under their CSPD plan to be trained to the standard.

A State VR agency has had a model Transition Unit, with a teacher having a Masters in Special Education functioning as part of the unit. This individual, under the supervision of VR staff, serves as a VR counselor, carrying a caseload and doing all the associated tasks of VR counselors. She is de facto, a VR counselor. She is also currently under the agency's CSPD plan to obtain additional training in a CORE accredited program. The question: Can this individual continue to function as a VR counselor?

Yes, so long as she is an employee of the State agency, and provided the conditions as described in the response to the question above are met. The CSPD provisions apply only to State agency personnel. However, remember that only State agency personnel may determine eligibility, approve an IPE and determine achievement of employment outcomes – these are functions that the State agency cannot delegate.

Are supervisors and managers of counselors required to meet at least the same standard as counselors?

The law and regulations do not specify that counselor supervisors and managers per se are required to meet counselor standards. However, if the supervisor or manager completes any of

the counselor functions listed above, even for one VR customer, then they must meet the standards for counselors

For those State agencies that operate their own rehabilitation center, must all the various disciplines working in that center meet their respective CSPD standards?

Yes. The CSPD provisions apply to all employees of the State agency.

Is an individual who determines eligibility and approves and signs the IPE for a consumer under the Title VI, Part B Program required to meet the State standard for vocational rehabilitation counselors or be part of the State agency's plan for current staff to meet the standard?

Yes. Any State agency employee who performs any of the functions of a counselor at any time must meet the standard for counselors (see question x), and the functions described above must be completed by the State agency staff – they are “non-delegable” functions.

My State agency has a difficult time recruiting specialty counselors as we have no specialty training programs in our region. We have a similar problem recruiting counselors of diverse background (disability, ethnicity). Can we hire such staff below the standard?

Possibly. If there is a true barrier to hiring counselors that meet State agency needs (including specialty counselors and “diverse” counselors) the State agency may hire below the standard provided they immediately implement plans to retrain them to the standard. In addition, the State must have a plan in place that works toward eliminating the need for such “exemptions.” States pursuing this option must have the full consent and approval of their Regional Commissioner.

How do these provisions apply to contractors that we use to provide many of our services?

The CSPD provisions apply only to State agency personnel. RSA encourages State agencies to maintain standards for staff of contractors that are consistent with the requirements for State agency staff.

The Act permits an individual eligible for VR services to develop the IPE without any assistance or to work with anyone, including a qualified VR counselor employed by the designated State unit, in developing the IPE. How does this flexibility in the development of the IPE relate to and complement the provisions of the CSPD that, in most instances, require designated State unit counselors to have a Master's degree in order to approve an IPE?

The CSPD provisions are designed to ensure that designated State unit (DSU) staff, particularly VR counselors, are qualified to carryout their responsibilities in assisting individuals with disabilities to achieve the employment outcomes to which they aspire. In this context, one of the key responsibilities of a DSU counselor is the approval of the IPE, regardless of the approach selected by the individual to develop the IPE, i.e. the individual develops the IPE alone, or with or without the assistance of the DSU counselor.

Approval of the IPE by the DSU counselor is the gateway to the implementation of the IPE. Thus, the DSU counselor must be knowledgeable about and conversant with not only a variety of disability-related vocational considerations impacting the individual but also community resources and agency policies affecting the IPE. To make supportable decisions with respect to the appropriateness of the provisions of the IPE, irrespective of how it is developed, the DSU counselor must make use of the information that is gathered through the assessment for determining eligibility and vocational rehabilitation needs. (See section 7(2) of the Act for the definition of the term "assessment for determining eligibility and vocational rehabilitation needs")

Since each person's needs are unique, the nature, scope, and focus of any assessment must be individualized to make supportable determinations regarding an eligible individual's chosen employment outcome, and the nature and scope of services needed by the individual to achieve the selected outcome. To this end, the scope of the assessment needs to include information about the individual's unique strengths, resources, priorities, concerns, abilities, capabilities, interests, and the extent to which the individual's choice is consistent with these primary employment factors. The assessment, while beginning at the time an individual applies for VR services, is an ongoing process that can continue after the individual's eligibility for services has been determined, if needed to develop IPE provisions that are realistic and appropriate to the employment needs of the individual.

Subsequent to the determination of an individual's eligibility for VR services, a comprehensive assessment can be carried out, if appropriate, to gather additional information upon which an IPE can be developed. This assessment can address considerations pertaining to the individual's personality, interests, interpersonal skills, intellectual and functional capacities, personal and social adjustment, work experience, vocational aptitudes, personal and social adjustments, employment opportunities, medical, psychiatric, psychological, and other pertinent vocational, educational, cultural, social, recreational, and environmental factors that affect the employment and rehabilitation needs of the individual. Information gleaned by the comprehensive assessment is key to the development of a well-constructed and focused IPE.

Once this assessment has been completed and the nature and scope of the IPE provisions have been determined, the individual is ready to develop the IPE either with or without assistance from any source. To assist the individual to make informed choices with respect to the development of an appropriate IPE, the DSU counselor must provide pertinent information regarding a variety of IPE considerations such as agency financial guidelines and criteria, the mandatory elements that must be addressed in the IPE, specific services, community service providers, and costs.

Before the IPE can be implemented the DSU counselor must review and approve the plan. In making the decision to approve or not approve the IPE, the DSU counselor must base the determination on the extent to which the provisions of the IPE are congruent with the assessment data and agency policies affecting IPE considerations. Subsequent to the implementation of the IPE, it is also the responsibility of the DSU counselor to ensure that the progress of the individual in achieving the provisions of the IPE is satisfactory and, if not, the plan is amended with the individual.

The increased flexibility that the Act affords individuals with disabilities in terms of greater choice and involvement in developing their IPEs does not diminish the role and importance of the work of the DSU counselor. It does, however, call for new or enhanced competencies on the part of counselors to serve in a variety of different roles. For some individuals, the counselor's role will be more as a facilitator and coordinator; for other individuals, the counselor will serve as an expert source of information; while for others, the counselor will need to take a more proactive and substantive role in assisting individuals with disabilities in the development of their IPEs. Thus, the greater control and empowerment provided to individuals in directing their rehabilitation programming require DSU counselors to serve in different capacities to complement the unique needs and capacities of the individuals with whom they are working. To this end, counselor competency is of paramount importance and the provisions of the CSPD serve to support the development and maintenance of that required competency.

RETRAINING REQUIREMENTS FOR COUNSELORS

If a current State agency rehabilitation counselor does not meet the standard for a rehabilitation counselor, can they continue to perform all counselor functions, including approving and signing an IPE and amendments to it?

Such counselors may continue to perform all counselor functions provided the counselor is covered under a plan approved by RSA, which must include provision for retraining of current staff.

How long does a State agency have to establish its standard for rehabilitation counselors?

RSA expects all States to have established standards by this time. Exceptions can be negotiated under unusual circumstances, with the full consent of the RSA Regional Commissioner.

How long do States have to retrain current counselors?

There is no set time line for retraining all counselors. RSA expects a timeline that reflects an assertive, yet reasonable plan given the particular circumstances of the State. For example, in one State most counselors may be at or near the standard. A year or two may be a reasonable timeframe for retraining current staff. In another States, most counselors may not meet the standard. There may be no in-State counselor training program, and the State may be resource poor. Five years or more may be a reasonable time frame for such a State. RSA depends upon its Regional Commissioners to make this determination. The Regional Commissioners are expected to look at the circumstances, including number who need to be retrained, capacity of training institutions to retrain current staff, and resources available before agreeing to a time frame.

GRANDFATHERING AND COUNSELORS CLOSE TO RETIREMENT:

The question of grand fathering continues to come up as it relates to veteran counselors, many of whom do not meet the standard for counselors. Can any of them be "grandfathered," exempting them from the need to be retrained to the standard?

No. Grandfathering is not allowed.

Can rehabilitation counselors who have indicated that retirement is genuinely planned for 3-5 years continue to function in the strictest sense as a State agency counselor, even though they are not covered by the CSPD plan? Is the 3-5 year range from retirement a liberal interpretation of the CSPD requirement?

Every VR customer deserves to be served by a qualified rehabilitation counselor. However, RSA understands that State VR agencies face challenges in retraining all staff, and that an investment of scarce training funds must be targeted toward the most effective use. In this regard, RSA has given latitude to States to prioritize who receives training. If a State decides to focus on training counselors who are likely to be with the agency for many years, and chooses to place counselors within, say, five years of retirement at the end of their priority list, RSA would likely accept that portion of the plan. Like much with the CSPD, decisions must be made consistent with the situation and resources of the agency.

EXPLAINING THE STANDARD FOR COUNSELORS

What is the requirement for personnel standards for rehabilitation professionals as it applies to rehabilitation counselors?

State VR agencies must establish personnel standards that are consistent with the degree standards of the highest licensing, certification or registration requirement in the state, or the degree standards of the national certification, CRC. The questions below may help clarify what this means and how to apply it.

We wish to base our standard on CRC. What is the minimum requirement?

If a State chooses to establish its personnel standards for rehabilitation counselors upon the national CRC standard, it must, at a minimum, require VR counselors to have one of the following (the degree requirements referred to are explained in more detail in appendix A, "CRC requirements."):

A) Master's in Rehabilitation Counseling.

OR

B) Master's degree in counseling with a graduate course in Theories and Techniques of Counseling.

OR

C) Master's degree in any discipline. At least 18 credit hours specified as follows:

1. One graduate course with a primary focus on the Theories and Techniques of Counseling.

AND

2. Three graduate courses, each with a primary focus on one of the following areas:

- a) Occupational Information
- b) Job Development and Placement
- c) Medical Aspects of Disabilities
- d) Foundations of Rehabilitation
- e) Psychological Aspects of Disabilities
- f) Personal and Vocational Adjustments

AND

3. Two graduate courses, each with a primary focus on one of the following areas:

- a) Assessment
- b) Research Methodology
- c) Vocational and Career Development
- d) Community Resources
- e) Case Management
- f) Delivery of Rehabilitation Services

D) A current CRC certificate, regardless of degree

Our State has chosen the “CRC eligible” as the standard. Not just the degree, but all that makes one eligible to sit for the CRC exam. What is the requirement?

There are two components – a qualifying degree, plus internship and/or employment requirements. These are explained below:

I. Degree Requirements:

Master's in Rehabilitation Counseling. Depending on whether the degree was granted by a CORE accredited program, a supervised internship and/or employment experience are required.

OR

Master's degree in counseling with a graduate course in the Theories and Techniques of Counseling, and 60 months of employment experience with 12 of the 60 under the supervision of a CRC. Additional coursework in Assessment, Occupational Information or Job Placement, Medical or psychological Aspects of Disabilities, or Community Resources or Delivery of Rehabilitation Services will lessen the amount of required employment experience.

OR

Master's degree in any discipline plus 18 hours of graduate courses as described in the question above along with 36 months of employment experience where 12 of the 36 was under the supervision of a CRC.

II. Internship/Experience Requirement

In addition to the education requirement, there is an internship requirement and employment requirement. With a Master's in Rehabilitation Counseling from a CORE accredited program, a 600-hour internship supervised by a CRC is required. If the program was not CORE-accredited, 12 months of employment under the supervision of a CRC is required in addition to the 600-hour internship supervised by a CRC. If the program was not accredited by CORE and there was no 600-hour internship supervised by a CRC, then 24 months of employment experience with 12 of the 24 under the supervision of a CRC is required. With a degree in counseling, employment experiences requirements range from 36 to 60 months with 12 under the supervision of a CRC, depending on the amount of applicable coursework. With a master's degree in any discipline and the required 18 hours of coursework, 36 months of employment experience with 12 under the supervision of a CRC are required.

More detail on these requirements can be found in appendix A. The complete set of requirements for CRC can be viewed and downloaded at the following web site:

<http://www.crccertification.org>

Our State has chosen the “CRC eligible” as the standard. A major barrier we have found is the supervisory requirement. What are the options for meeting this requirement? Can it be met on the current job? Must the supervisor be a CRC?

Supervision under a CRC can be the immediate supervisor or anyone within the upper chain of command. This can be met on the current job. If there is no one in the chain of command to supervise, provisional supervision can be arranged.

The Rehabilitation Act states that State agencies are responsible for, “the establishment and maintenance of standards that are consistent with any national or State approved or recognized certification, licensing, registration, or other comparable requirements that apply to the area in which such personnel are providing vocational rehabilitation services...” Does this mean that a State VR agency may choose to establish its standards for VR counselors on standards such as state personnel standards?

No. The regulations clarify that other comparable requirements (including State personnel requirements) may form the basis of personnel standards **only** in the absence of State or national certification, licensing or registration requirements. Most States have certification, licensing or registration requirements, and the CRC is a national certification standard.

If a State establishes a standard based on the CRCC standards and the CRCC standards are later changed, must the State revise its standard accordingly? Must rehabilitation counselors who were qualified under the prior standard become qualified under the new standard?

If a State chooses only the degree requirements of the CRC, then -- A State has some flexibility in this regard. While a State may choose to require staff to meet any such “new standard,” it could choose a different policy. For example, after establishing an initial standard (one that is consistent with CSPD requirements), all current employees would be required to be retrained to that standard, and “new hires” would be expected to meet that standard. If the State or National standard changed later, the State would be expected to revise its standards, and new counselors would be expected to meet the revised standard. Counselors hired before this time would not be expected to be retrained to this new standard. Such an approach is similar to the CRC practice in which counselors who became certified under a prior version of the CRC standards do not have to meet revised degree standards.

If a State chooses the CRC credential as its standard (the credential itself, not only the degree requirements), then -- Once a standard is established, it maintains until changed. Those who have met the standard, remain certified as long as certification is maintained. The state (employer) decides if this is acceptable.

On a related matter, RSA expects States to revise their standards within a reasonable timeframe after a relevant licensing, certification or registration requirement change. RSA interprets “reasonable timeframe” to be one year, under normal circumstances.

CRC includes a category, D-4, which allows persons with Masters degrees in any field to be eligible for CRC provided they have completed certain coursework. The Matter of Related-Degrees with special course work State HRD Specialists believe that although they are working hard to get their counselors certified, the closing date is unrealistic (it expires in December of 2000).

Can the deadline be extended?

CRCC has extended the phase out date for Category D.4 to December 16, 2004. This will allow individuals to apply through December 15, 2004.

Related degrees.

The State HRD Specialist believes there is too much guess work in the current process. CRCC should develop a listing of acceptable related degrees that qualify and what relevant course work must be successfully completed for the CRC.

CRCC generally accepts only counseling degrees. Other degrees are reviewed individually for content and comparison to the standards. The counseling degrees and D 4 specify the course work.

What are the options for meeting the supervisory requirement for individuals employed by state VR agencies? Can it be met on the current job? Must the supervisor be a CRC?

Under ideal circumstances, the counselor's immediate supervisor is a CRC. Recognizing that this is not always the case, there are a number of ways that this requirement can be met:

1. CRCC has provided for "provisional supervision." See Attachment #1. As long as a "Provisional Contract" has been approved (i.e., prior approval), a counselor who is certified can provide the supervision necessary for a counselor to meet the requirement of having been supervised by a CRC. However, to obtain approval, the individual must apply for certification and indicate that they will require provisional certification.
2. Supervision is not always the immediate supervisor: For example, if the individual in charge of "Field Services" for the state VR program is a CRC, that person is, in fact, supervising the counselors within the state agency. Thus, the supervisor can range from one's immediate supervisor to the director of the agency. However, the person doing the supervising must have responsibility for counseling activities. In other words, you cannot have someone who is the Chief Financial Officer serving as supervisor.
3. For individuals who are meeting CSPD requirements through the granting of the degree, the counselor can complete the internship on the job. (CORE does not prohibit this. Some institutions have not allowed it, but it can be negotiated. For example, the job hours [600] count towards the internship, but the internship may include specific objectives to enhance one's role, e.g., conducting a transition group; working with a couple of clients from someone else's caseload, if the counselor has a specialty caseload; targeting placement, if that has not been a counselor's strength.)

Related Degrees: There seems to be much inconsistency and guesswork on the part of the agencies. Can CRCC provide greater specificity?

CRCC is unable to provide greater specificity. The curriculum of each program is reviewed to ensure that all standards are met. The most frequent problem is not so much the name of the degree, but that it does not include a theories and techniques of counseling course. Individuals who believe they have had the "content" that would be included in a Theories and Techniques of Counseling Course, but the course had a different title, should always submit the course description and preferably the course syllabi to document that the course meets the intent of the requirement. If the content is contained in a number of different courses, then all of the relevant syllabi should be submitted.

IMPLEMENTATION: RETRAINING CURRENT STAFF

How are we to pay for retraining current staff?

The RSA training program has provided \$20,000,000 in funding for the retraining effort, and every State agency has access to some training "slots" or funds under the current allocation. While RSA long-term training grantees are funded primarily to train students to increase the supply of counselors available to state agencies, some of these grantees provide scholarships to state agency counselors. States are also expected to use some of their in-service training

dollars for the retraining effort. States are also expected to use other additional funds, such as Title I funds or State funds to retrain current staff within a reasonable time frame. To view a list of RSA-funded CSPD and other long term training grants that offer scholarship assistance, visit the RSA training program web site at www.ed.gov/offices/OSERS/RSA/PGMS/RT.

The "CSPD" grants funded by RSA are helpful in retraining our current counselors to the standard. May we use those grants to train "counselor aides" or others who would make good counselors? May we hire staff below the standard and use the grant to train them to the standard?

The CSPD grants are to train current counselors who do not meet the standard in their State, to bring them up to the standard. The grant conditions on these CSPD grants are very specific -- grantees may not use their funds to train any staff but current counselors, nor for any purpose but to bring current counselors up to the degree standard established for rehabilitation counselors. The reason for this is simple. The VR system has 4,000 counselors who need to be retrained. The funds available for retraining these counselors are limited. To use the few funds available for other purposes severely dilutes the effort. We encourage states to train other staff members who show potential to be a counselor, but the State should use other resources for doing so.

Concerning the CSPD grants funded by RSA, may we train non-counselor staff to the standard we have established for the appropriate category of personnel?

No (see response to previous question).

What happens if an individual cannot pass the GRE or other entrance requirements of the universities?"

The graduate entrance requirements of the Council on Rehabilitation Education (CORE) accredited programs may include the Graduate Records Exam (GRE), the Miller's Analogy Test (MAT), and grade point average of undergraduate program have been established because they are predictors of ability to be successful with graduate studies.

Some institutions may have options of a "provisional admissions status" which may be considered with scores in one area that are just below the cut-off or other entrance requirements that are not met. If the entrance requirements cannot be met and no "provisional admissions status" is possible, the applicant cannot be admitted.

One option for such an applicant may be to enroll in coursework at an institution as a non-degree student which would allow individuals to complete requirements to become CRC eligible, thus fulfilling CSPD requirements.

In addition, some institutions may waive some entrance requirements for the adult learner.

Resources for identifying other options include the National Council on Rehabilitation Education (NCRE) and the Oklahoma State University Clearing House of Rehabilitation Training Materials.

If CRC is the standard for counselors and it is expected that their supervisors and managers met the same standard, we have found that some managers and supervisors are unable to quality to sit for the exam. (This is because they are not providing direct counseling services, since they are supervisors).

Are there plans to change this?

There are no plans to change the CRC standard. The Commission has always felt that someone in a supervisory capacity should have direct counseling experience in his/her past. There have been a few instances where this direct counseling occurred so long ago as to make verification difficult. In those instances, the Commission has worked with the individual to try to secure acceptable verification.